Agenda 5/25/11 DEQ/EPA Source Control Integration into PH ROD

Purpose of Mtg

1) Discuss schedule for ROD & possible forms of ROD

2) Discuss how upland source control will be integrated into PH ROD

Desired Outcomes of Mtg

1) Gain better shared understanding of integrating source control into ROD

2) Define "Next Steps"

Assumptions

1) PH ROD (discussion lead by EPA)
   -Schedule for ROD- late-2013 or 2014

   -Form of ROD- comprehensive…, interim…, sequential…, partial…, etc???

   -EPA's realistic vision of acceptable source control-

   -SMA/AOPC-specific recontamination potential analyses in RD- Who does this (in-water RP?)…, who's the lead agency…, when is this done?

   -Guidance & examples- EPA "ROD Guidance"…, Puget Sound RODs?????

2) PH Upland Source Control (discussion led by DEQ)
   -Status of source control at ROD
      -**High Priority Sites**-
      -**Medium Priority Sites**-
      -**Low Priority Sites**-

   -Contaminant migration pathways
      -**Groundwater**-
      -**Stormwater/waste water**-
      -**Bank erosion**-
      -**Overland runoff**-
      -**Overwater releases**-
      -**Airborne deposition to river**-

Discussion

1) PH Proposed Plan/ROD- how will source control be integrated into each document?

2) PH Upland Source Control

Next Steps

1) What documentation is needed for PP & ROD…., when?

Talking Points- 5/25/11 DEQ/EPA SW SC/ROD Mtg

4/8/10 DEQ/EPA/City SW SC Mtg

-EPA's vision of a SC "Companion Document" to the PH ROD
  -Current status of SC
  -Strategy/plan for achieving SC
  -Potential for recontamination
    -What are the controlled sources?
    -What are the sources currently doing source control work?
    -What is the potential for currently unidentified, significant sources?
  -Timeline for achieving SC & implementing remaining elements of overall strategy (e.g., SW permits)
  -How is SC Strategy designed to accommodate the unexpected (e.g., unexpected recontamination…, currently unidentified significant source)
  -Should be finalized & accepted by EPA shortly after draft FS is submitted

DEQ's PH SW SC Strategy

-Both the status & preliminary strategy of SW SC were presented as a stand-alone document attached to the 9/10 PH Milestone Report
-EPA wants the PH SW SC strategy to include: 1) relative importance of SW pathway…, 2) what DEQ's accomplished in SW SC (discovery, evaluation, control)…, 3) what needs to be done…, 4) decision tree…, & 5) short-term & long-term plans for SW SC

Recontamination Potential Analysis (RPA)

-3 separate efforts:
  1) DEQ using SEDCAM
  2) LWH using Hybrid Model
  3) EPA???
-EPA stressed the RPA is important…, but it's a model. What's most important is Performance Monitoring to verify model predictions
-EPA stresses if we're planning on doing Performance Monitoring…, we need to start soon to establish baseline conditions

Status of Source Control at ROD

-High Priority Sites-
  -**Current number of High Priority Sites**- 15
  -**Sites anticipated to have SC completed by PH ROD or shortly after**- 15/15
  -**Questionable sites**- 5/15 (City OFs, PEO, Gasco, Arkema, Gunderson)
  -**Sites with interim SCMs in place**- 11/15
  -**Sites where SW is only remaining pathway in SCE**- 5/15
-Medium Priority Sites-
  -**Current number of Medium Priority Sites**- 28
  -**Sites anticipated to have SC completed by PH ROD or shortly after**- all 28/28
  -**Questionable sites**- 4/28 (Shore Terminal, GS Roofing, Glacier NW (RM 11E), Cargill)
  -**Sites with interim SCMs in place**- 16/28
  -**Sites where SW is only remaining pathway in SCE**- 4/28
-Low Priority Sites-
  -Current number of Low- 24
  -Sites anticipated to have SC completed by PH ROD or shortly after- all 24/24
  -Questionable sites- 0/24
  -Sites with interim SCMs in place- 15/24
  -Sites where SW is only remaining pathway in SCE- 6/24

Contaminant Migration Pathways

-Groundwater-

-Qualitative evaluation-

-GW contamination is a significant threat at only a handful of sites. These are the sites we're focusing. Most of these significant sites have interim SCMs in place.

-A number of other sites have GW plumes that exceed SLVs (ARARs), but don't appear to pose a significant threat of recontamination. DEQ will continue to consider these sites, but they are not our highest priority.

-Sites posing significant threat of recontamination-

-11 (PEO, KM Linnton, Arco/BP, Exxon/Mobil, Gasco, Gasco MGP waste at Siltronic, Siltronic TCE, Rhone Poulenc, Arkema, Willbridge, Gunderson)

-8/11 have interim GW SCM in place

-Stormwater/waste water-

-Qualitative Evaluation

-SW pathway is common & not trivial…, but it's uncertain what threat (load) SW discharges to river

-SW pathway will never be eliminated…, & will always contain some amount of contamination

-DEQ PH SW Strategy

-See 9/10 "*Update on SW SC*"

-Status of PH SW SC

-SW SCE are needed or ongoing at >75 sites

-SW SCDs have been issues at 16 sites, & DEQ considers SW to be an insignificant or incomplete pathway at >50 sites

-Next steps

-Complete PH SW Strategy (fall 2011)

-Continue SCE/BMPs/SCMs at PH sites

-Complete loading & RPA

-Bank erosion-

-Qualitative Evaluation

-Bank erosion pathway is common & not trivial

-Only a handful of sites have or will have adequate SCE &/or SCM completed by the ROD for this pathway. Our strategy has been to defer bank erosion work at many sites to RD for the in-water work to be done after the ROD. This will better integrate the in-water & any river-bank work that needs to be done.

-Overland runoff-

-Qualitative Evaluation

-Uncommon pathway. Most overland runoff is captured by stormwater conveyance systems

-Overwater releases-

-Qualitative Evaluation

-Uncommon pathway & pathway that doesn't fit very well into SC

-Airborne deposition to river-

-Qualitative Evaluation

-Airborne deposition to land surface should be covered by stormwater SCE

-Airborne deposition to river surface was eliminated as trivial in JSCS

-One except is Schnitzer Steel Site. DEQ has directed SSI to conduct an evaluation airborne contaminant transport to both the river & their neighbors. DEQ/SSI is in formal dispute resolution over this directed action.